



WRIGHT STATE  
UNIVERSITY

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Computing and Telecommunications Services  
130 Library Annex  
3640 Colonel Glenn Hwy.  
Dayton, OH 45435-0001

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February 10, 2000

James D. Schlichting  
Deputy Bureau chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C254  
445 Twelfth Street, SW  
Washington, DC 20554

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FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in  
the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Wright State University currently has over 14,500 full-time students and 1,900 full-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but

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the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Wright State University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

A handwritten signature in cursive script that reads "Paul R. Hernandez/sa".

Paul R. Hernandez  
Director  
Computing & Telecommunications Services  
Wright State University  
3640 Col. Glenn Highway  
Dayton, Ohio 45435

ORIGINAL

Wheaton College  
Norton, Massachusetts 02766-0930  
(508) 285-7722  
FAX (508) 285-8270

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**Wheaton**

February 10, 2000

**RECEIVED**

FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. James Schlichting  
Deputy Bureau Chief,  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C254  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Wheaton College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wheaton College to significant financial liability that would undermine our ongoing effort to provide educational services.

Wheaton College currently has over 1400 full-time or full-and part-time students and 500 full and part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Wheaton College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

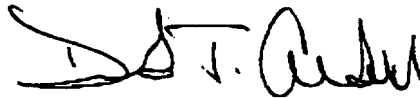
We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral

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presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned to keep the cost of operations as unencumbered as possible. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CIT, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



David T. Caldwell  
Director, Information Technologies & Services

# URSINUS COLLEGE

P.O. BOX 1000 - COLLEGEVILLE, PA 19426-1000

610/489-4111 - FAX 610/489-0627

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February 9, 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. Thomas Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C252  
445 Twelfth Street, S.W.  
Washington, DC 20554

Mr. Thomas Sugrue

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the  
Commercial Mobile Radio Services

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Ursinus College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Ursinus College to significant financial liability that would undermine our ongoing effort to provide educational services.

Ursinus College currently has over 1300 students and 450 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that

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protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Ursinus College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Frederick L. Klee

Director of Telecommunications

Telecommunications Office

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Business Administration B21  
Albany, New York 12222518/442-3456  
Fax: 518/442-3425**UNIVERSITY AT ALBANY**  
STATE UNIVERSITY OF NEW YORK

February 10, 2000

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FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. Thomas Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C254  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Dear Mr. Sugrue:

As a member of ACUTA: The Association of Telecommunications Professionals in Higher Education, the University at Albany, State University of New York has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the University at Albany, State University of New York to a significant financial liability that would undermine our ongoing effort to provide educational services.

The University at Albany, State University of New York currently has over 16,000 full and part-time students and 4,500 full or part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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Mr. Thomas Sugrue

Page 2

February 10, 2000

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the University at Albany, State University of New York. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Gary R. Pelton  
Director

/sjp

cc: Magalie Roman Salas, Secretary





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FEB 10 2000

***Yavapai***  
**COLLEGE**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

1100 East Sheldon Street • Prescott, Arizona 86301 • (520) 445-7300

Prescott Campus

February 9, 2000

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in  
the Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Yavapai College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Yavapai College to significant financial liability that would undermine our ongoing effort to provide educational services.

Yavapai College currently has over 9000 full-and part-time students and over 500 full and parttime employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme

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Campuses in Prescott and Clarkdale, Arizona

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as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Yavapai College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

- We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

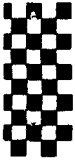
As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Rick Giardini

Director, Information Technology Services  
Yavapai College

**C A L S T A T E  
FULLERTON***Information Technology*  
(714) 278-2601 / Fax (714) 278-3990**ORIGINAL****EX PARTE OR LATE FILED**

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, S.W.  
Washington, DC 20554

**RECEIVED****FEB 10 2000****FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

Dear Mr. Levin

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in  
the Commercial Mobile Radio Services.

California State University, Fullerton agrees wholeheartedly that CPP service should be permitted and encouraged provided that consumer protection as described in FCC 99-137(June 10, 1999) is implemented. We note with concern what appears to be a reluctance to provide institutions with PBX or Centrex systems a reasonable method to identify and account for such calls. Our Call Accounting System, like most we have seen, rates calls based on the dialed number and a rate table. Were CPP calls to be indistinguishable from local or toll calls, the amount we recharge our departments for usage may be substantially different from the amount we owe carriers or a host of mobile service providers.

Our experience with carriers and other providers leads us to believe that they are not good at providing even rudimentary information which would allow us to reconcile billing information, such as which station placed the call.

Although billing practices may not fall under the FCC, we are concerned about the potential for fraud and confusion should the University begin to receive invoices claiming to be from service providers wanting compensation for what they claim are calls to their CPP subscribers, but for which they can provide no accurate information to allow us to reconcile the charges. Although following the FCC's logic in para. 50 & 51, persons who make calls from University phones could be seen as agents for the University and thus creating an implied contract to pay for CPP services, the University follows strict state regulations which forbid employees from entering into contracts except through narrowly prescribed procedures. With most universities now allowing local calling from most phones, we certainly do not intend for unknown persons to create contracts for us.

In short, should such an invoice arrive, our Accounts Payable department will almost certainly refuse to pay it.

Should such billing problems exist, as I believe they will, the appropriate action by the University is to block such calls until proper billing arrangements can be instituted. If CPP service cannot be separated from local and toll service, we have no effective tools with which to regulate service.

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*Information Technology*  
(714) 278-2601 / Fax (714) 278-3990

We agree completely with the Association of College and University Telecommunications Administrators (ACUTA) that CPP service should be clearly identified as separate from local and toll calls so that operators of PBX and Centrex systems will have the ability to block or require authorization for such calls as appropriate.

Sincerely yours,

A handwritten signature in cursive script that reads "Dick Bednar".

Dick Bednar  
Senior Director, Information Technology

Cc: ACUTA

## Andrews University

ORIGINAL

February 10, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the  
Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Andrews University has closely followed the Calling Party Pays ( CPP ) rule making proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Andrews University to significant financial liability that would undermine our ongoing effort to provide educational services.

Andrews University currently has over 2968 full and part-time students and 684 full-time and 1500 part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for a variety of calls, such as toll ( 1+ ) calls and calls to pay-per-call services (i.e., calls to 900 numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her

Office of the President

Berrien Springs, Michigan 49104-0670 Tel 616.471.3100 Fax 616.471.6203

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charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Andrews University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes( SACs ) to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

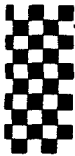
Sincerely,



Niels-Erik Andreasen  
President

vb

cc: Magalie Roman Salas



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FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 12th Street, S.W.  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in  
the Commercial Mobile Radio Services

Dear Mr. Levin

As a non-profit university, and a member of ACUTA, we support the position expressed in ACUTA's comments regarding this matter.

Aurora University is deeply concerned that without appropriate safeguards, CPP will expose us to significant financial liability that would undermine our educational services.

Unless a call to a cellular phone number has a unique area code, prefix, or other unique identifier, calls to cell phones would be billed to the university and not the caller. This is because the Ameritech central office only sees our outgoing trunk number, not the actual phone extension of the caller.

It seems to us that the most efficient and cost effective way to deal with the problem is to require a "Service Access Code" to access a CPP number.

We have considered many options and support the numbering system advocated by ACUTA in its comments and presentations in this proceeding.

The FCC would best serve the public interest and accomodate the needs of institutions such as Aurora University by assigning a unique SAC to all CPP numbers.

Thank you for considering our views in this matter.

Sincerely,

Robert J. Roehrig  
Telecom manager  
Aurora University

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**BINGHAMTON**  
UNIVERSITY

**ORIGINAL**

**OFFICE OF THE ASSISTANT VICE PRESIDENT  
FOR AUXILIARY SERVICES**

PO Box 6000  
Binghamton, New York 13902-6000  
607-777-2881, Fax 607-777-6451

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February 9, 2000

FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. Joe Levin  
Wireless Telecommunications bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Binghamton University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Binghamton University to significant financial liability that would undermine our ongoing effort to provide educational services.

Binghamton University currently has over 12,500 full-time and part-time students and over 3,500 full and part time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBX can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the

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notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Binghamton University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBX we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Carl Gilmore  
Assistant Vice President  
for Administration

cc:



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# CALIFORNIA STATE UNIVERSITY, SACRAMENTO

UNIVERSITY TELECOMMUNICATIONS SERVICES

February 9, 2000

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Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, California State University, Sacramento has closely followed the Calling Party Pays (93CPP94) rulemaking proceeding and strongly supports the positions expressed in ACUTA 92s comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose California State University, Sacramento to significant financial liability that would undermine our ongoing effort to provide educational services.

California State University, Sacramento currently has over 25,000 students and 3,000 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll (931+94) calls and calls to pay-per-call services (i.e., calls to 93900 94 numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by California State University, Sacramento. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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6000 J Street, Sacramento, California 95819-6091 • (916) 278-7707 • (916) 278-6664 FAX

THE CALIFORNIA STATE UNIVERSITY • Bakersfield • Chico • Dominguez Hills • Fresno • Fullerton • Hayward • Humboldt • Long Beach • Los Angeles • Maritime Academy  
Monterey Bay • Northridge • Pomona • Sacramento • San Bernardino • San Diego • San Francisco • San Jose • San Luis Obispo • San Marcos • Sonoma • Stanislaus

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes (93SACs 94) to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely, ✓



Richard E. Rossi  
Director



ORIGINAL

## UNIVERSITY OF CALIFORNIA, SANTA CRUZ

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COMMUNICATIONS AND  
TECHNOLOGY SERVICES

SANTA CRUZ, CALIFORNIA 95064

February 10, 2000

Mr. Joe Levin

Wireless Telecommunications Bureau

Federal Communications Commission

Room 3-B135

445 Twelfth Street, SW

Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in  
the Commercial Mobile Radio Services

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear: Mr. Levin

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, University of California, Santa Cruz has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose University of California, Santa Cruz to significant financial liability that would undermine our ongoing effort to provide educational services.

University of California, Santa Cruz currently has over 10,000 students and 4500 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls. Our telephone operations and infrastructure is not state funded, but is operated as a non profit Auxiliary Enterprise solely from usage revenues.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party. The result will be unidentified toll expense which will have to be passed on to our customers in the form of increased monthly service charges. We cannot operate at a deficit and continue to provide telephone service to our customers.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by University of California, Santa Cruz. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our revenue stream.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have

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consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Patrick Le Cuyer  
Acting Associate Vice Chancellor

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# CALVIN

College

February 10, 2000

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554

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FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

3201 Burton Street S.E.

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial  
Mobile Radio Services

Grand Rapids, MI 49546

Dear Mr. Levin:

616-957-6000

Fax 616-957-8551

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Calvin College has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Calvin College to significant financial liability that would undermine our ongoing effort to provide educational services.

Calvin College currently has over four thousand students and one thousand employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can

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be made to CPP numbers, the cost of which will ultimately be borne by Calvin College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Robert L Myers  
Dir. Network & Communications Services  
Calvin College  
3201 Burton SE  
Grand Rapids MI 49546-4388  
Phone 616-957-6620  
Fax: 616-957-8550

cc: Magalie Roman Salas,  
Secretary (2 copies for filing in record)

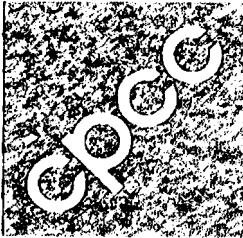


Office of the  
President

February 9, 2000

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Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554

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FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

CENTRAL  
PIEDMONT  
COMMUNITY  
COLLEGE

Dear Mr. Levin:

Our college is very concerned about the proposed Calling Party Pays options for cellular service. Our community college has a PBX system and a very limited budget to support education and training services for approximately 60,000 individuals each year.

It is very important to us that calls made from a cellular phone have an identifiable area code. We cannot bear the financial impact of a CPP option without safeguards for a PBX.

Thank you for your attention to this matter.

Sincerely,

*Mary Beth Collins*

Mary Beth Collins  
Executive Assistant to the President

P.O. Box 35009  
Charlotte, North Carolina  
28235-5009

<http://www.cpcc.edu.us>

Tel: 704/330-2722  
Fax: 704/330-5045



State of California

**Memorandum**

EX PARTE OR LATE FILED

To: Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554  
Fax: (202) 418-7247

Date: February 10, 2000

File:

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FEB 10 2000

From: Jerry Hanley

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Subject: Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA, the Association of Telecommunications Professionals in Higher Education, California Polytechnic State University (Cal Poly), San Luis Obispo has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA comments. Like many ACUTA members, we are a non-profit educational institution that is deeply concerned that without appropriate safeguards, CPP will expose Cal Poly to significant financial liability that would undermine our ongoing effort to provide educational services.

Cal Poly currently has over 16,400 students and more than 3,400 full and part time faculty and staff members. With an extensive telecommunications infrastructure that is accessible to such a large number of faculty, staff and student users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, faculty, staff and student users place telephone calls from extensions in campus buildings that are routed through a centralized private branch exchange (PBX) administered by my Telecommunication Services group. Our existing PBX can easily be programmed to block, or track call detail for a variety of calls, such as toll calls (1+area code and number) and calls to pay-per-call services (i.e., calls to 1+900 or 1+area code+976 numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her residence hall room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our call accounting system to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But, this kind of notification by itself would not protect our university from unauthorized CPP calls. A faculty, staff or student user can hear the notification, but the university will never be able to bill that faculty, staff or student user for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Cal Poly. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

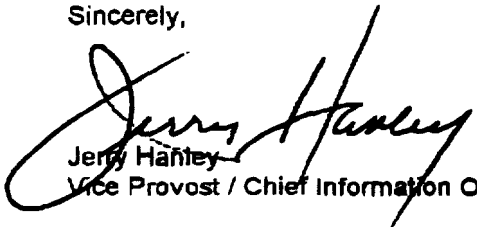
We understand that the record before the Commission reflects a range of views on how large colleges and universities might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and

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administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes (SAC) to CPP numbers. With very little effort, and at almost no cost, our PBX could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our university the considerable expense and the disruption of replacing the PBX we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest – and accommodate the needs of educational institutions such as ours – by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Jerry Hanley  
Vice Provost / Chief Information Officer

ORIGINAL

THE UNIVERSITY OF  
CHICAGO

EX PARTE OR LATE FILED

1155 East 60th Street • Chicago, IL 60637  
773/702-7616 • FAX: 773/702-0559  
Pager: 773/834-1955 #9975  
j-iannantuoni@uchicago.edu

Office of the Executive Director

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February 10, 2000

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Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARYRe: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial  
Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA, the Association of Telecommunications Professionals in Higher Education, the University of Chicago has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the University of Chicago to significant financial liability that would undermine our ongoing effort to provide educational services.

The University of Chicago currently has approximately 12,400 students, 1,900 faculty and 5,000 staff. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll (1+) calls and calls to pay-per-call services (i.e., calls to 900 numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the University of Chicago. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

Networking Services &amp; Information Technologies

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We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes (SACs) to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SACs in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Yours truly,



John E. Iannantuoni

cc: Magalie Roman Salas, Secretary

ORIGINAL

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Cleveland State University  
1860 E 22 St, RT1002  
Cleveland, Ohio 44115

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FEB 10 2000

February 10, 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in  
the Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Cleveland State University has closely followed the Calling Party Pays rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Cleveland State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Cleveland State University currently has over 15,000 full- and part-time students and 1000 full and part employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll (?1+?) calls and calls to pay-per-call services (i.e., calls to ?900? numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or

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employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Cleveland State University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Joan Boatman

System Supervisor, Telecommunications



ORIGINAL

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Colgate University  
13 Oak Drive  
Hamilton, NY 13346

FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Information Technology Services

February 10, 2000

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street S.W.  
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial  
Mobile Radio Services

Dear Mr. Levin,

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Colgate University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Colgate University to significant financial liability that would undermine our ongoing effort to provide educational services.

Colgate University currently has over 2800 students and 800 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

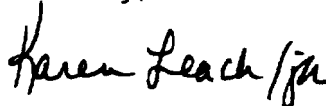
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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Colgate University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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Sincerely,

A handwritten signature in black ink, appearing to read "Karen Leach/jh".

Karen Leach  
Chief Information Officer